

**OCCUPATIONAL SAFETY  
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**OCCUPATIONAL SAFETY AND HEALTH  
STANDARDS BOARD**

**BOARD STAFF'S REVIEW OF  
PETITION FILE NO. 526**

Petitioner: Unite Here

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Title: Senior Engineer-Standards

Date: April 9, 2012

OCCUPATIONAL SAFETY AND HEALTH STANDARDS BOARD

Staff Review of Petition No. 526 submitted by  
Unite Here

Petition for the Promulgation of Safety and Health Standards  
For the Protection of Hotel Housekeepers

INTRODUCTION

The Occupational Safety and Health Standards Board (Board) received a petition dated January 23, 2012 recommending that the Board adopt safety and health standards for the protection of hotel housekeepers. The Petitioner notes that Unite Here is a labor organization that represents thousands of California workers who are employed in the hotel and hospitality industry through its affiliated local unions.

The Petition states that hotel housekeepers are exposed to serious occupational risks in the course of their normal work duties. Housekeeping duties include activities such as, changing bed linen, scrubbing bathroom floors and fixtures, polishing, dusting, vacuuming, and pushing heavy linen carts. The Petition indicates that housekeepers suffer the highest injury rate among all classifications of hotel employees and that they are more likely to suffer musculoskeletal disorders than all other hotel employees.

The Petitioner states that the proposed standard (Appendix A, of the Petition) is comprised of a balance of performance and prescriptive requirements that address the factors that contribute to occupational injuries among housekeepers.

Labor Code Section 142.2 permits interested persons to propose new or revised regulations concerning occupational safety and health and requires the Board to consider such proposals and to render its decision no later than six months following their receipt.

REASON FOR THE PETITION

Some of the primary reasons noted by staff for the Petitioner's proposal are outlined in the several paragraphs that follow:

The Petitioner states that, during the past decade, hotel operators have increasingly competed in the type of luxury rooms offered. Room upgrades include luxury bedding consisting of oversized, heavier mattresses and bedding packages that have large, quilted comforters that can be bulky and include up to six pillows and other amenities such as heavier bath linens. The Petitioner comments

that the new linen requires housekeepers to load their carts heavily or to make more trips to linen rooms to replenish cart supplies. Also, some hotels are providing larger linen carts that are heavy and cumbersome to wheel over carpeted areas. The use of motorized linen carts with adjustable shelving would be required in the recommended proposal to mitigate exertion involved in pushing manual linen carts.

The Petitioner states that, in some cases, employers have implemented cleaning protocols that have increased the number of rooms and beds that must be cleaned on a daily basis. The proposal would place limitations on the total square footage space that may be assigned to housekeepers to clean during an 8-hour shift based on factors that would include the type of amenities in rooms and the number of rooms scheduled for check-out.

Making beds, lifting mattresses and the tucking of loose sheets/linen presents lifting hazards according to the Petitioner and indicate the need for fitted sheets and the availability of special tools to assist with the lifting of mattresses. The Petitioner comments that the use of a properly sized fitted bottom sheet eliminates the number of mattress lifts per bedding change, further reduces awkward postures associated with mattress lifting, and avoids unnecessary manipulation of bed linens.

In order to reduce awkward postures, forceful lifting and exertions, and extended reaches in hotel cleaning activities, safe housekeeping equipment would be either required or available to include adjustable long-handled cleaning tools such as mops, scrubbers and dusters; fitted sheets; laundry hampers on wheels; motorized carts with adjustable height shelves; ergonomically designed vacuum cleaners, and other equipment. The proposal also includes hazard assessments, safe cleaning and work practices, and monitoring and training requirements for employers. The Petitioner urges adoption of the proposed standards in order to prevent debilitating injuries suffered by housekeepers and contain the financial costs that result from these injuries.

### HISTORY

The Board has not received any similar petition seeking to promulgate standards specific the safety and health of hotel housekeepers. However, hotel and housekeeping employers are subject to provisions in the General Industry Safety Orders (GISO) Section 3203 (effective July 1, 1991) that require every employer to maintain an effective Injury and Illness Prevention Program (IIPP). Hotel and housekeeping employers are also subject to compliance with GISO Section 5110 "Repetitive Motion Injuries" (RMIs). Section 5110 of Title 8 requires among other things, that action be taken to reduce RMIs when more than one employee in a 12 month period incurs an RMI injury while performing the same repetitive motion task.

### FEDERAL OSHA STANDARDS

Federal OSHA does not have standards that are specific to hotel housekeeping and hospitality worker provisions outlined in the petition.

### STAFF EVALUATION

The petition documents include a list of injuries incurred by housekeeping employees at one hotel property for an approximate three-year period, from 2006 to part of 2010. There are strain and sprain type injuries to various body areas that occur to hotel staff in the performance of housekeeping duties. The injury descriptions emphasize the need for hotel employers to take actions specific to their operations to mitigate the frequency and severity of potential injuries. It is evident in health and safety literature and by observation that hotel housekeeping duties include arduous cleaning work and bedding/linen changes that are subject to time constraints triggered by factors such as, guest check-in times.

The petition includes information that Hawaii OSHA (HIOSHA) in 2011 issued a Hawaii Hyatt Hotel property an informational letter subsequent to an ergonomic evaluation of housekeeping operations. The letter identified a number of potential ergonomic hazards and possible control options for the employer to consider. HIOSHA concluded that, since HIOSHA has no standard that applies to ergonomics, no citations would be issued. Voluntary measures were recommended to reduce ergonomic related hazards.

The petition also includes information that Region IV of the California Division of Occupational Safety and Health (Division) had issued an Informational Memorandum to a Los Angeles hotel property in 2011. Reference was made to the provisions of GISO Section 5110 to mitigate ergonomic exposures. Staff also learned that the Division's San Francisco office issued Section 5110 related ergonomic citations to a San Francisco Hotel in 2011. The citations stated in part, that the employer had not implemented engineering and administrative controls for housekeeping tasks that included bed making, bathroom cleaning, vacuuming, and other surface cleaning. Additionally, in one citation, the Division stated that training programs in accordance with several Section 5110 provisions had not been implemented for employees involved in housekeeping activities. Thus, the Division has the ability currently to issue hotel employers citations for violations of the California ergonomics standard.

The Petitioner's proposed standard includes primary categories such as the development of a Safe Housekeeping Plan, Administrative Controls, Monitoring and Evaluation, Communication and Training, Record Keeping and Employee Rights. Board staff believes that a stakeholder's advisory committee should be convened to determine to what extent there may be duplication and overlap with existing Title 8 standards and the Petitioner's proposal. For example, when the ergonomics standard, Section 5110, is triggered by RMIs, it also requires worksite evaluation, control of exposures including engineering and administrative considerations, training and methods to minimize RMIs. However, as a performance standard, Section 5110 does not prescribe the specific control measures denoted in the petition that an employer must implement for specific industries, such as the hotel and lodging industry.

The proposed standard would require the use of certain housekeeping tools and equipment. One provision would require that a fitted sheet be used in lieu of a flat sheet for the bottom sheet on all mattresses. There is pending legislation regarding fitted sheets (Senate Bill 432). This bill was passed in the Senate and last amended in August of 2011. It is currently in suspense pending

approval by the Assembly Appropriations Committee. This bill would require the Board to adopt a standard no later than December 15, 2012, relating to housekeeping in hotel and lodging establishments requiring the use of a fitted sheet, instead of a flat sheet as the bottom sheet on beds, or the use of equipment (e.g. wedge, or other device) or alternative work practice or method to assist in the installation of sheets. The bill further specifies the use of long-handled tools for cleaning bathrooms in order to eliminate the need for housekeepers to work in stooped, kneeled, or squatting positions.

Board staff finds differing opinions within the lodging and hotel/housekeeping industry regarding the ergonomic benefit of flat versus fitted sheets. Some say that fitted sheets require more mattress lifting and sheet tucking than loose fitted sheets. The Division contracted with several ergonomists to assist with the analysis of several California hotels, and their findings, with respect to the use of fitted sheets, is that control measures such as the use of fitted sheets, can reduce the amount of lifting, reaching and bending. However, an evaluation dated August, 2011, prepared for the California Hotel and Lodging Association by Steven F. Wiker, Ph.D., CPE of the Ergonomic Design Institute, concluded that the use of fitted sheets would not benefit housekeepers from a health and safety standing point, and their use would produce a small increase in housekeeper physical burden and fatigue.

The Petitioner also points out that Cal/OSHA Consultation Service Publication, "Working Safer and Easier" under the heading "Tips and improvement ideas" recommends the use of a fitted bottom bed sheet over the mattress. More discussion and evaluation is necessary regarding this issue including input from stakeholders. An advisory committee of stakeholders should evaluate the extent to which certain tools and housekeeping equipment specified in the proposal are currently available to workers and whether there is necessity to consider rulemaking amendments.

The Petition does not provide cost estimates for the types of "safe housekeeping equipment" defined in Section 0002 of the proposed standard, including such items as ergonomically designed vacuum cleaners, fitted sheets as the bottom sheet on all California hotel mattress beds and the mandated use of motorized or self-propelled linen carts. It is unclear from the proposed language whether manually-pushed linen carts would continue to be permitted.

Motorized housekeeping linen carts are available, but are not frequently used in the hotel industry today. During check out times, many hotels are busy with guests, housekeeping workers and their linen carts, and guest services staff all sharing tight hallways with blind corners simultaneously. There may be potential for employees or hotel guests to be struck by a motorized cart, and contact with a heavier, power-driven cart would be more severe than with a manual cart. Further, it is unclear whether motorized carts could be accommodated in older properties that cannot utilize standard or larger-sized carts because they have smaller elevators and tighter hallway corners.

The Petitioner's proposal includes a provision that housekeepers not be required to clean more than 5,000 square feet of total room space during an 8-hour shift. This limit is subject to modifications in light of factors such as the number of check-out rooms or rooms with additional beds. However, these types of quotas or restrictions limiting the amount of work an employee can be assigned are

typically not addressed in Title 8 standards, but rather are determined as a condition of employment and/or are addressed in collective bargaining agreements.

The Petition indicates that hotel housekeeping employees are subject to occupational musculoskeletal injuries, and the Petitioner's proposal would require a number of control measures that include specific safe housekeeping tools and equipment, as well as administrative and procedural requirements to reduce risks. However, the petition does not sufficiently discuss the extent to which these controls may already be available or provided as an option, nor does the petition provide enough information to establish the necessity of the items outlined in the proposal's definition of "safe housekeeping equipment."

Several of the documents referenced in the petition conclude that hotel housekeepers have an increased risk of developing occupational musculoskeletal injuries. Board staff agrees that a significant number of musculoskeletal injuries occur in this industry and that appropriate control measures can reduce those risks. However, additional information, discussion, and clarification from industry stakeholders is necessary in order to sufficiently evaluate the necessity for undertaking a rulemaking action that includes both performance based standards and prescriptive control measures specific to hotel housekeeping operations.

#### RECOMMENDATIONS

For the reasons stated above, Board staff recommends that the petition be granted to the extent that an advisory committee be convened by the Division to determine if a rulemaking action should be initiated and what control measures may be necessary to address musculoskeletal injury hazards to hotel housekeeping employees. The Petitioner should be invited to participate in the committee deliberations.